

IN THE UNITED STATES DISTRICT COURT  
EASTERN DISTRICT OF MISSOURI  
EASTERN DIVISION

EXHIBIT  
R

TRACEY WHITE, et al.,	)	
	)	
Plaintiffs,	)	
	)	
vs.	)	Cause No. 14-cv-01490-HEA
	)	
THOMAS JACKSON, et al.,	)	
	)	
Defendants.	)	

DEPOSITION OF DAVID RYAN

Taken on behalf of the Plaintiffs

October 1, 2015

Reported by: Christine A. LePage, CCR #1000

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1           Q     Okay. And what I'm asking is were they under  
2 your supervision or the supervision of the captain or  
3 somebody else?

4           A     My men were under my supervision.

5           Q     Your men were under your supervision, okay. And  
6 your men effectuated the arrest of Ms. White, correct?

7           A     One of my men were there and then two others  
8 were from St. Charles County.

9           Q     Okay. And whose authority were they under?

10          A     It would have been the St. Louis County police  
11 department at the time, because we were in charge of that  
12 scene.

13          Q     Okay.

14          A     And then I was running that scene at that time.

15          Q     Okay. And Mr. Davis, same thing?

16          A     Yes, sir.

17          Q     Okay. Ever been involved in any lawsuits  
18 before?

19          A     Yes, sir.

20          Q     When I ask that question, that question does not  
21 go to your personal life, it only goes to your  
22 professional life. So with that qualification -- In other  
23 words, I'm not asking you about your personal business.

24          A     Understood.

25          Q     What I'm asking you about is your professional

1 Miss White, correct?

2 A I don't even know who he is.

3 Q So based on your presence at the scene, your  
4 view of the videos, the people that were involved in those  
5 arrests, to your knowledge, were with St. Louis County,  
6 correct?

7 A Or St. Charles County.

8 Q Okay. Those would be the two, right?

9 A Yes, sir.

10 Q And quickly I'd like to discuss the chain of  
11 command. You've already discussed that you're the  
12 sergeant, that you have several men under your authority,  
13 correct?

14 A Yes, sir.

15 Q And you report to the lieutenant colonel of  
16 St. Louis County, correct?

17 A Right now or then or --

18 Q I apologize, that wasn't clear. On the day that  
19 we're talking about, the arrests of Miss White and  
20 Mr. Davis.

21 A Yes, sir.

22 Q And you mentioned that St. Louis County took  
23 control over the area at least at that time, correct?

24 A Yes, sir.

25 Q Did you -- Were you familiar at all with the

1 City of Ferguson's policies or procedures?

2 A No, sir.

3 Q Okay. Safe to say that you weren't -- you were  
4 not relying upon any of their policies or trying to follow  
5 those policies because you didn't know about them, right?

6 A Correct.

7 Q Did you receive any orders from anyone at the  
8 City of Ferguson, including the former chief, Tom Jackson,  
9 with respect to the actions that you -- that you took  
10 during these arrests and the time immediately preceding?

11 A No, sir.

12 Q Any directives that you had came from your chain  
13 of command within St. Louis County, right?

14 A Correct, sir.

15 Q Thank you very much for your time, sir.

16 MR. HUGHES: I have no questions.

17 MR. LATTIMER: That's it. Thank you, sir.

18 MR. HUGHES: He'll waive signature.

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20 \*

21 BY AGREEMENT OF COUNSEL AND WITH CONSENT OF THE WITNESS

22 THE SIGNATURE IS HEREBY WAIVED.

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